

BEFORE THE PUBLIC UTILITIES COMMISSION
OF THE STATE OF CALIFORNIA



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Order Instituting Rulemaking to Develop an
Electricity Integrated Resource Planning
Framework and to Coordinate and Refine
Long-Term Procurement Planning
Requirements.

R.16-02-007

**CALIFORNIA COMMUNITY CHOICE ASSOCIATION'S
MOTION FOR AMENDED RULING AND EXTENSION OF TIME**

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July 1, 2019

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The California Community Choice Association (CalCCA) submits this *Motion for Amended Ruling and Extension of Time* pursuant to Rule 11.1 and Rule 11.6 of the Commission's Rules of Practice and Procedure (Motion). The Motion responds to the *Assigned Commissioner's and Administrative Law Judge's Ruling Initiating Procurement Track and Seeking Comment on Potential Reliability Issues*, issued on June 20, 2019 (Ruling). A *Motion to Shorten Time for Response* to this motion is being filed contemporaneously.

I. INTRODUCTION

The Ruling seeks comments on the "potential for near-term reliability challenges"¹ based on conclusions drawn by Energy Division Staff in their analysis of the near-term resource adequacy market. It contemplates Commission direction to all load-serving entities to procure and bring online by August 1, 2021, 2000 MW of new resource adequacy (RA) resources. It further contemplates re-contracting by Southern California Edison Company (SCE) of an additional 500 MW of existing resources. The Ruling directs parties to provide comments on

¹ Ruling at 1.

these proposals and additional questions by July 15. CalCCA looks forward to providing comments, but requests additional information and an extension of time to ensure that its comments are informed and useful to the Commission in determining its next steps.

II. REQUEST FOR AMENDED RULING

The Ruling relies on Staff's analysis of the near-term resource adequacy market. It states that Staff has relied on "publicly available sources of information, in order to provide analysis of the conditions and obtain party input on those conditions."² Rather than provide the analysis itself, however, the Ruling only summarizes the analysis and provides limited comments on assumptions.

CalCCA requests that the Assigned Commissioner and Administrative Law Judge (AC/ALJ) amend the ruling by appending the actual Staff analysis to enable parties' full review. Providing the analysis is necessary for the Parties to understand current conditions and minimize the time required to address these circumstances, if necessary. In particular, CalCCA requests information sufficient to understand Staff's full analysis including, at a minimum: (1) data sources; (2) inputs; (3) assumptions; (4) calculation methodology; and (5) outputs. In presenting this information, CalCCA requests that the amended ruling make clear:

- Staff's assumptions regarding the degree of "slack capacity" assumed in its analysis;
- The extent to which the proposed changes in Effective Load Carrying Capability (ELCC) factors affects the Staff's conclusions; and
- The nature of the resources the ruling would direct SCE to re-contract; specifically, whether these resources are local capacity resources and/or flexible capacity resources or otherwise provide any value apart from system RA value.

² *Id.* at 6.

CalCCA requests that the AC/ALJ issue an amended Ruling that includes the Staff analysis by July 8. In the alternative, CalCCA requests that Staff convene a workshop to present their analysis, addressing these and other questions, in advance of the schedule for parties' comments.

III. REQUEST FOR EXTENSION OF TIME

For the reasons discussed above, CalCCA requests an extension of time to respond to the Ruling to facilitate an informed and useful analysis. CalCCA requests that the AC/ALJ extend the time for comments to a date that is three weeks following the issuance of the complete Staff analysis. Assuming the Staff analysis is provided on July 8, as requested, comments would be due on July 29, with replies due on August 9. Alternatively, if a workshop is scheduled, CalCCA requests that the date for comments be set at a minimum of two weeks following the workshop date, with replies due 10 days thereafter.

Pursuant to Rule 11.6, CalCCA requested agreement from parties to this proceeding in an email on Monday, July 1, at 9:58 a.m. Parties agreeing include: Western Power Trading Forum, Calpine, Clean Power San Francisco, Middle River Power, The Utility Reform Network, Alliance for Retail Energy Marketing, Shell Energy, Solar Energy Industries Association, Jan Reid, Public Advocates Office, Enel X and C Power. Pacific Gas and Electric Company does not object to the extension. Southern California Edison Company and the Independent Energy Producers Association oppose the extension of time on grounds of the urgency of the need for additional procurement.

IV. CONCLUSION

For all of the foregoing reasons, CalCCA requests that the AC/ALJ amend the Ruling to append the full Staff analysis of near-term reliability concerns, release the underlying data, methodology and assumptions supporting the analysis and modify the schedule for comments to accommodate more informed and useful recommendations.

July 1, 2019

Respectfully submitted,

Evelyn Kahl

A handwritten signature in blue ink that reads "Evelyn Kahl". The signature is written in a cursive, flowing style.

Counsel to
the California Community Choice Association